

Great Lakes Division
No. 1 Quality Drive
Ecorse, Michigan 48229
(313) 297-2100

July 15, 1993

Mr. Roy J. Caniano, Chief
Nuclear Materials Safety Branch
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137-5927

SUBJECT: "RFPLY TO A NOTICE OF VIOLATION"

REFERENCE: License No. 21-10459-01 Docket No. 030-04891

Dear Mr. Caniano:

This letter is in response to your correspondence dated June 18, 1993 which was received by us via US mail on June 24, 1993.

Concerning the Notice Of Violation item No.1, this violation occurred because the Maintenance Planner did not assign personnel who had been "qualified" by Great Lakes Steel to perform this work. Great Lakes Steel provides a 2hr. radiation safety course to people who work on or in close proximity to radiation sources. This instruction includes training on the applicable provisions of the regulations and the conditions of the license. The "users" and the Radiation Protection Officer maintain a roster of personnel who are "qualified"- that is to say, a roster of workers who have completed this annual course. As a means of correction, the Maintenance Planner has been disciplined and informed of the proper procedure. In the future, only "qualified" personnel will be assigned to perform this work. Compliance with this will be immediate.

Concerning the Notice of Violation item No.2, this violation occurred because the Maintenance Planner did not notify the Electronics Department to "Lock-out" the source. The Electronics Department maintains a roster of "qualified" people who, as part of their training, are instructed as to how to "Lock-out" the particular device. The Planner has been instructed to, in the future, notify Electronics to perform a "Lock-out" prior to hopper entry. Therefore compliance is immediate.

Along with these actions, we are looking into the following supplemental actions:

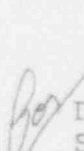
Page 2:"REPLY TO NOTICE OF VIOLATION"

- A. The hopper will be supplied with additional warning signs at possible entry points.
- B. We intend to consider the possibility of more illumination so that the signs are more visible.
- C. All the employees who were involved with this incident are being scheduled to attend our safety orientation course.
- D. A description of the event was published in our company's monthly Safety Publication.
- E. We are looking into scheduling all project engineers and planners to attend the safety course.
- F. The appropriate SOP will be reviewed and corrected as needed.
- G. This event will be discussed at the annual 2hr. radiation safety training.

In ending, we respectfully submit this "reply to notice of violation". It is our utmost desire to correct this situation so that it will not occur again.

Please call myself or Mr. Brian Malley (313)297-3711 if you have any questions or comments.

Sincerely,

 *C. Brian Malley*
D. Huck, Manager
Safety & Industrial Hygiene



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1401 E. Quincy Drive
Ecorse, Michigan 48229
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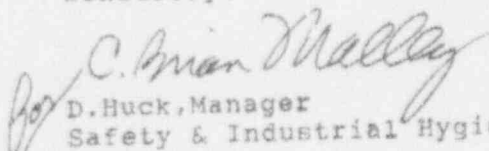
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